

Exhibit B

From: McGeogh, Michelle (Balt) <mcgeoghm@ballardspahr.com>
Sent: Thursday, May 12, 2022 3:02 PM
To: Pace, Damon; Kodeck, Ari
Cc: McCormack, Timothy F. (Balt); Freeman, Fanta (Phila); Kussmaul, Matthew (Phila); Kerner, Justin (NJ); Pratt, Maraya (Balt); Orebamjo, Olamide S. (Balt)
Subject: Canter v. Zeigler - Document Production Issues
Attachments: DefenseProdESI-Baucom200001353.pdf; Canter - Relativity - List of Zip Files.xlsx

Damon and Ari,

Certain documents that were produced by your office were produced only with image placeholders and not the native zip files. A sample is attached. Also attached is the list of zip files at issue. In short, we cannot view any of the files on the attached list. Therefore, they will need to be reproduced with the native zip file. Can you please produce these as soon as possible?

Also, please be advised that we are missing quite a few sets of the minutes from the gender dysphoria committee. At a minimum, we are missing the following minutes: 11/9/2018, 2/15/2019, 5/3/2019, 8/2/2019, 11/22/2019, 2/7/2020, 5/15/2020, 8/7/2020, 11/6/2020, 2/5/2021, 5/7/2021, 8/6/2021, 11/5/2021 (we are also missing 2022 minutes).

We are also missing e-mails and other responsive documents from the following custodians:

- Richard Graham (WCI warden)
- Brenda Reese
- Charlotte Zies
- Kamala Hall

Please note that the subpoena also required DPSCS to identify certain custodians, including people with knowledge of the events described in the Complaint and any other members of the Gender Dysphoria Committee (not already on the list). The subpoena also required you to search for and produce records kept by the Regional Gender Dysphoria Committee, the mental health review team, the NBCI and WCI Psychology Departments, the NBCI Housing Unit #1 Treatment Team, as well as the records of any other treatment team, committee or department involved in Plaintiff's medical or mental health care.

Finally, I do not believe you have reproduced the 247 page PDF that you assembled, which caused the metadata from the documents included in the assembled PDF to be erased. Please be sure to produce all responsive documents in accordance with the protocol, including all metadata.

The above list does not include those items and categories of missing documents we have previously raised with you and with the Court during our conference. There are many categories of documents in the subpoena that have not yet been produced. We understand that you continue to produce documents on a rolling basis.

Our review of the documents is not yet complete, so there are likely other deficiencies that remain with regard to the document production.

We look forward to receiving the documents. If you have questions, please let us know.

Thank you,
Michelle

Note Our New Address: 111 S. Calvert Street, 27th Floor, Baltimore, MD 21202-6174

Michelle M. McGeogh

2021 Pro Bono Honor Roll – Gold

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